

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION

WINIFRED BLACKLEDGE)

Plaintiff,)

vs.)

CASE No.: CV 2:06-CV-321-ID

ALABAMA DEPARTMENT OF)
MENTAL HEALTH & MENTAL)
RETARDATION & COMMISSIONER)
JOHN HOUSTON, in his Official)
Capacity as Commissioner.)

Defendants.)

PLAINTIFF'S COUNTER-DESIGNATION OF DEPOSITION PAGES

COMES NOW the plaintiff, by and through the undersigned counsel and identifies counter-designation pages to Susan Stuardi's deposition as follows:

1. **Susan Stuardi deposition**

Plaintiff designates the following counter-deposition pages:

19(3-6)
19(17)-20(6)
25(23)-26(14)
27(14)-28(3)
28(22)-29(9)
29(15)-31(22)
33(9-23)
35(22)-36(17)
50(11)-52(14)
53(2)-54(3)
55(5)-56(4)
56(14)-57(17)
57(18)-58(14)

60(3)-61(10)
67(19)-71(15)
73(9-16)
73(19)-74(9)
75(14)-76(2)
76(7)-78(13)
79(7-16)
79(17-22)
86(22)-87(20)
87(21)-88(6)
88(19)-89(2)
94(22)-96(1)
97(2)-98(12)
99(21)-100(3)
100(19)-102(1)
107(21)-109(10)
109(11)-111(4)
114(17)-115(23)
117(22)-118(16)
120(3-23)
132(23)-135(17)
136(5)-138(6)
140(6)-141(1)
154(16)-155(17)

2. Plaintiff renews her objections to the other depositions which defendants are attempting to submit as evidence.¹ Such designations by defendants violate Federal Rule Civil Procedure 32 and Federal Rules of Evidence 401, 402, 403, 801, 802, 803, 804 and 805 as set forth in Plaintiff's Objections and Motion to Strike. Should the Court conclude that defendants' deposition designations of the Plaintiff, Fordyce Mitchell, Eranell McIntosh-Wilson, Henry Ervin or Jerrlyn London are proper under Federal Rule of Civil Procedure

¹Plaintiff's objections to Defendants' Deposition Designations and Motion to Strike is being filed contemporaneously.

32 and the Federal Rules of Evidence, plaintiff reserves the right to submit responsive designations for any properly submitted deposition testimony as provided by the Rules of Civil Procedure and the Court's Scheduling Order.

Respectfully submitted,

/s/ Rocco Calamusa, Jr.

Rocco Calamusa, Jr.

Joshua D. Wilson

Attorneys for the Plaintiff

OF COUNSEL:

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205/314-0500

CERTIFICATE OF SERVICE

I do hereby certify that on this the 18th day of February, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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OF COUNSEL